SEP 3 1998

Mr. Gordon Rousseau HMT Associates, L.L.C. 1850 K Street NW Suite 200 Washington, DC 20006

Dear Mr. Rousseau:

This is in response to your letter of September 3, 1998, requesting clarification on the marking requirements for intermediate bulk containers (IBCs) under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180) Specifically you ask if an inner receptacle for an IBC may be marked with three different standards (e.g., 31HA1, 31HG1 and 31HH1) to identify it as having been tester and suitable for use with any one of the three outer casings (i.e., metal, fiberboard or plastic).

The answer is yes. There is no prohibition in the HMR against placing multiple markings on an receptacle of an IBC to show that it has been tested to different standards.

I hope this information is helpful.

Sincerely,

Edward T. Mazzullo

Director, Office of Hazardous

Materials Standards

LaValle:DHM-11:68553:9/3/98

File: 178.703

98 - 0606

CONCURRENCES RTG. SYMBOL initials/sig. Mr. Gordon Rousseau Ref. No. 98-0262 HMT Associates, L.L.C. RTG. SYMBOL 1850 K Street NW Suite 200 INITIALS/SIG." Washington, DC 20006 Dear Mr. Rousseau: RTG. SYMBOL This is in response to your letter of September 3, 1998, requesting clarification on the marking 'INITIAL'S/SIG.' requirements for intermediate bulk containers (IBCs) under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Specifically you ask if the inner receptacles for an IBC may be DATE. marked with three different standards (e.g., 3/1HA1, 31HG1 and 31HH1) to identify them as havi been tested and suitable for use with any one of the three outer casings (i.e., metal, fiberboard or plastic). The answer is yes. There is no prohibition in the HMR against dual marking an inner receptacle IBC as qualified to different standards. I hope this information is helpful. Sincerely, Delmer F. Billings Chief, Standards Development Office of Hazardous Materials Standards LaValle:DHM-11:68553:9/3/98 File: 178.703